

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:

City of Detroit, Michigan,
Debtor.

Bankruptcy Case No. 13-53846

Judge Thomas J. Tucker

Chapter 9

**STIPULATION RESOLVING PROOF OF CLAIM NUMBER 2442 FILED
BY SERVICE EMPLOYEES INTERNATIONAL UNION, LOCAL 517M**

Service Employees International Union, Local 517M, the claimant (“Claimant”), and the City of Detroit, Michigan (“City”), hereby stipulate and agree as follows in support of the entry of the Order Approving Stipulation Resolving Proof of Claim Number 2442 Filed by Service Employees International Union, Local 517M.

1. Claimant filed Claim Number 2442 (“Claim”) on February 21, 2014.

2. On March 7, 2019, the City filed its Sixty-Fourth Omnibus Objection to Certain Claims (No Valid Basis for any Liability of the City) [Doc. No. 13016]. Claim Number 2442 was one of the claims subject to the objection.

3. Claimant and the City have conferred regarding Claim Number 2442 and have agreed that Claim Number 2442 should be allowed as a Class 15 Convenience Claim in the amount of \$3,200.00 under the *Eighth Amended Plan for the Adjustment of Debts of the City of Detroit (October 22, 2014)* (Doc. No.

8045) (“Plan”). All other claims asserted in Claim Number 2442 have either been satisfied or are disallowed and expunged.

4. As provided by the terms of Class 15 of the Plan, upon Claimant’s provision to the City of a properly completed W-9 form, Claimant will receive a cash payment of \$800.00, which is 25% of the allowed amount of the claim, in full and final satisfaction of Claim 2442.

5. Claimant does not waive any rights or interests it may have with respect claim number 2851 of the Coalition of Detroit Unions which was allowed pursuant to the Order entered at docket number 11754 in this bankruptcy case.

WHEREFORE, the City and the Claimant respectfully request that the Court enter an order in the form attached as Exhibit 1 hereto.

Respectfully submitted,

MILLER, CANFIELD, PADDOCK AND
STONE, P.L.C.

By: /s/ Marc N. Swanson
Marc N. Swanson (P71149)
150 West Jefferson, Suite 2500
Detroit, Michigan 48226
Telephone: (313) 963-6420
Facsimile: (313) 496-8451
green@millercanfield.com
swansonm@millercanfield.com

Attorneys for the City of Detroit

NICKELHOFF & WIDICK, PLLC

By: /s/ Marshall J. Widick
Marshall J. Widick (P53942)
333 W. Fort St., Suite 1400
Detroit, MI 48226
Telephone: (313) 496-9472
Facsimile: (313) 965-4602
mwidick@michlabor.legal

*Attorneys for Service Employees International
Union, Local 517M*

Dated: April 12, 2019

EXHIBIT 1

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:

City of Detroit, Michigan,
Debtor.

Bankruptcy Case No. 13-53846

Honorable Thomas J. Tucker

Chapter 9

**ORDER APPROVING STIPULATION RESOLVING PROOF OF CLAIM
NUMBER 2442 FILED BY SERVICE EMPLOYEES INTERNATIONAL
UNION, LOCAL 517M**

Upon the *Stipulation Resolving Proof of Claim Number 2442 Filed by Service Employees International Union, Local 517M*, submitted by the City of Detroit (“City”) and Claimant Service Employees International Union, Local 517M (the “Stipulation”)¹; the parties having stipulated to the allowance of claim number 2442 as a Class 15 Convenience Claim in the amount of \$3,200.00; and the Court being otherwise fully informed:

IT IS ORDERED THAT

1. Claim Number 2442 is allowed as a Class 15 Convenience Claim in the amount of \$3,200.00. All other claims asserted in Claim Number 2442 have either been satisfied or are disallowed and expunged. As provided by the terms of Class 15 of the City’s confirmed *Eighth Amended Plan for the Adjustment of Debts*

¹ Capitalized terms used but not otherwise defined in this Order shall have the meanings given to them in the Stipulation.

of the City of Detroit (October 22, 2014) (Doc. No. 8045), upon Claimant's provision to the City of a properly completed W-9 form, Claimant will receive a cash payment of \$800.00 in full and final satisfaction of Claim 2442. Other than Claim 2442, Claimant has no further Claims of any kind against the City as of the Effective Date of the Plan.

2. This Order and the Stipulation will not operate to waive any rights or interests that Claimant may have with respect claim number 2851 of the Coalition of Detroit Unions which was allowed pursuant to the Order entered at docket number 11754 in this bankruptcy case.

3. The City's claims agent is authorized to update the claims register to reflect the relief granted in this Order.

4. The Court retains jurisdiction over any and all matters arising from the interpretation or implementation of this Order.